

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-against-

17 Cr. 00475(WFK)

DILSHOD KHUSANOV,

Defendant.

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**DECLARATION OF RICHARD LEVITT IN SUPPORT OF
DILSHOD KHUSANOV'S PRETRIAL MOTIONS**

Richard W. Levitt, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury that the following is true and correct:

1. I, along with Deborah Colson, Esq., represent Defendant Dilshod Khusanov in the above-captioned matter.

2. I submit this Declaration in Support of Mr. Khusanov's accompanying pretrial motions and declare that all statements of fact in the accompanying Memorandum of Law are true to the best of my knowledge and information.

3. The following Exhibits annexed to the accompanying Memorandum of Law are incorporated herein:

- A. Defense Memorandum of FISA intercepts – being separately provided to the Court for in camera review, but previously provided to government "wall" counsel;
- B. December 14, 2018 discovery letter to government;
- C. May 1, 2019 discovery letter to government; and
- D. Scheduling order, *U.S. v. Grant*, 18-cr-179 (WJM) (DNJ).

4. Pursuant to Local Criminal Rule 16.1, I have conferred with counsel for the government concerning discovery issues raised in defendant's pretrial motions in good faith efforts to resolve those issues without intervention of the Court.

Dated: October 18, 2019
New York, NY

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard Levitt", written over a horizontal line.

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Dilshod Khusanov*